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June 1, 2022

Magistrate Judge Andrew E. Krause
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *USA v Charles Berard*, 22 MJ 4169

Your Honor:

I write to ask that this Court grant permission for Mr. Berard to travel and attend one event on June 4, 2022. I have conferred with his pre-trial services officer, who consents to this application. AUSA Steven Kochevar informs me that the government takes no position.

As you may recall, Mr. Berard has been released on an unsecured bond, co-signed by three financially responsible persons. The bond specifies that Mr. Berard is on home detention, and that his travel is limited to the District of Massachussetts (where he resides), the SDNY, and the EDNY. The bond also directs Mr. Berard to seek employment. During the initial appearance, we noted that Mr. Berard is a musician. This Court indicated that he may seek employment as a musician, so long as it was verifiable and did not involve regular travel.

Months prior to Mr. Berard's arrest, he had agreed to perform as an opening act at an event on June 4th at the Toyota Oakdale Theater in Wallingford, Connecticut. This event is expected to be attended by thousands of people and likely to provide Mr. Berard with many additional opportunities to earn money as a musician (even with the caveat that he would not be traveling). In addition, many members of Mr. Berard's immediate and extended family have made plans to attend this event.

Attending this event would not entail extensive travel or time away from Mr. Berard's residence. He will need to leave his home around 3 pm so that he could be present for a sound-check at 5 pm. He is scheduled to perform from 7:15-8 pm. Although the concert will continue for hours,

he intends to leave immediately after his performance, by about 8:15 p.m. Depending upon traffic conditions, should be home by 9:30-9:45. Pre-trial services has been notified of all of these details, which have been confirmed by family members.

Considering that this is a one-time event of some importance, the consent of the pre-trial services office, and all the other circumstances, we ask that this Court grant Mr. Berard permission to leave his home at 3 p.m. on June 4, 2022, travel to the Toyota Oakdale Theater in Wallingford, Connecticut, and return home by 9:45 p.m.

Respectfully submitted,

/s/

James E. Neuman

APPLICATION GRANTED. The limited, temporary modification of bail conditions set forth in this letter is approved.

Dated: June 1, 2022

SO ORDERED.



ANDREW E. KRAUSE
United States Magistrate Judge